

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW HAMPSHIRE

William S. Justice, Pro Se v. Christopher T. Sununu, et al.  
(PLAINTIFF) (DEFENDANTS)

Case No. 1-20-CV-00517-PB

Date: Monday, Sept. 16<sup>th</sup>, 2024

MOTION FOR THE INCLUSION OF CORRECTIONAL OFC. EMA E. DONLAGIC AS A DEFENDANT IN THIS LAWSUIT DUE TO HER INCRIMINATING SELF-ADMISSION OBTAINED IN DISCOVERY (Bates DOC-022) OF TASER ASSAULT AGAINST PLAINTIFF, WILLIAM SOLER, JR. (aka) WILLIAM S. JUSTICE

Please Honorable Court, can you put forth an order based on the evidence being submitted <sup>in</sup> this motion (Exhibit A) to render additional defendant service and inclusion of Sgt. Ema E. Donlagic, as a defendant in this lawsuit. Thank you Most Honorable Court, this is all the anticipated relief that the plaintiff seeks at the moment. (God BLESS).

William S. Justice

c: Nathan W. Kenison-Marvin, esq.; Wanda J. Duryea



State of New Hampshire  
Department of Corrections

Incident Report

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Facility: Secure Psychiatric Unit

Incident Number: 2019-115

Housing Level: SPU, Infirmary

Date/Time of Incident: 1/22/19 20:56

Criminal Investigator Number:

Investigation Staff: Marshall, Scott

Supervisor: Donlagic, Ema E

Incident Type:

**Summary of Events:** On 01/22/19 at approximately 1835 I observed Pt. Soler, William attempting to break his light in India 5. At which point I called for additional staff Soler refused to get off his desk and cuff up he also made statements such as "I'm going to jump and hit my head" and it appeared he was going to do so. It was then determined that we would enter the cell to secure Soler from self-harm at which point he attempted to hit Co. Logan. Soler was brought to the floor where he remained resistive refusing to put his hands behind his back to be handcuffed at which point I deployed the Taser hitting Solar in the upper right shoulder. Soler was eventually cuffed and escorted to 4pts by Co. Logan and Co. Deblais. Where he was assessed by nursing end of INR.

**Recommendations:**

**Resolution:**

Taser cartridge placed in evidence - Sgt. Donlagic

  
Staff's Signature

  
Date

EXHIBIT

A

09/16/24 (Mon.)

PLACE  
STAMP  
HERE

William S. Justice  
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Concord, NH 03301  
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DISTRICT OF NH  
NY  
2024 SEP 16 P 2:32  
24 2024 DEPOSITORY  
Jennifer Bartlett, Case Manager  
U.S. District Court, Dist.  
55 Pleasant Street, Rm. 110  
Concord, NH 03301